

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS**

**IN RE:**

MARINA ZIAZIARIS	)	Case No.: 15-07776
	)	
	)	Chapter: 13
	)	
Debtor(s)	)	Judge Jacqueline P. Cox

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**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

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NOW COMES, Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2014-11TT ("Creditor"), by its attorneys, Marinosci Law Group, P.C., and pursuant to Bankruptcy Rule 3002.1(g) hereby responds to the trustee's notice of final cure payment, and states as follows:

1. Mortgage Information:

Name of creditor: Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2014-11TT

Court claim no.: 8

Last 4 digits of any number you use to identify the debtor's account: 8147

Property Address: 1451 W. Thome Ave., Chicago, IL 60660

2. Prepetition Default Payments:

Creditor agrees that it has received \$30,000.00 in pre-petition payments.

3. Postpetition Mortgage Payment

Creditor states that the debtor is not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- |   |              |
|---|--------------|
| a. Total postpetition ongoing payments due: | \$4,434.98   |
| b. Suspense balance:                        | (\$1,937.59) |
| c. Total.                                   | \$2,497.39   |

Creditor asserts that the debtor is contractually obligated for the postpetition payment(s) that are due for 04/01/2018.

4. Itemized Payment History is attached hereto at Exhibit 1.

DATED: May 23, 2018

Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2014-11TT,

By: /s/ Timothy M. Johnson  
Marinosci Law Group, P.C.,

### **CERTIFICATE OF SERVICE**

The undersigned certifies that the above instrument was filed electronically with the Court on May 23, 2018, and that he has determined that the following person(s) are registered with the Court for electronic filing, and, therefore, will be sent a copy of the pleading by the Court:

Tom Vaugh, Trustee, ecf@tvch13.net  
Thomas W Drexler, Attorney for Debtor(s), Marina Ziazaris tim.bkct@kcccp.com  
Patrick S Layng, U.S. Trustee, USTPRegion11.ES.ECF@usdoj.gov

/s/ Staci Matthei  
Staci Matthei  
Marinosci Law Group, P.C.

**PROOF OF SERVICE**

I hereby certify that on May 23, 2018, I deposited a copy of the foregoing in a U.S. Post Office Box, enclosed in an envelope with proper postage pre-paid, and addressed to the following in the manner set forth:

Marinia Ziazaris  
1451 W. Thome Ave  
Chicago, IL 60660

/s/ Staci Matthei  
Staci Matthei  
Marinosci Law Group, P.C.

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